



Public Service Commission of Wisconsin

Cheryl L. Parrino, Chairman
Scott A. Neitzel, Commissioner
Daniel J. Eastman, Commissioner

Jacqueline K. Reynolds, Executive Assistant
Lynda L. Dorr, Secretary to the Commission
Steven M. Schur, Chief Counsel

Michael Paulson
Ameritech Wisconsin
722 N. Broadway
Milwaukee, WI 53202

Re: In the Matter of a Complaint and Petition
for an Order Requiring IntraLATA Equal
Access in the Exchanges of Ameritech
Wisconsin

6720-TI-111

Dear Mr. Paulson:

At its open meeting of August 29, 1996, the Commission considered the request of Wisconsin Bell, Inc. (d/b/a Ameritech Wisconsin), for Commission reconsideration of its oral decision in this docket to require implementation of intraLATA presubscription as of September 1, 1996, and for a thirty-day stay of that order pending further consideration.

Background

Previously, at its open meeting of August 27, 1996, the Commission decided, in docket 6720-TI-122/7832-TI-101, that the interconnection agreement between Wisconsin Bell, Inc. (d/b/a Ameritech Wisconsin), and GE Capital Communications Services Corporation (GECCS) was not consistent with the public interest, convenience, and necessity. The Commission found that the interconnection agreement contained a provision tying the competitive resale of Ameritech local telecommunications services to the exclusive provision of Ameritech intraLATA and interLATA toll service. The Commission determined that this tie-in is anti-competitive in that it denies GECCS customers a choice of long distance carrier contrary to the intent of the federal Telecommunications Act of 1996 and the orders of this Commission in docket 6720-TI-111.

On August 27, 1996, the Commission also considered the related request for waiver submitted in this docket, 6720-TI-111. The Commission found that GECCS has such an insignificant presence in the telecommunications market in Wisconsin that it is not reasonable to believe this agreement can serve as an appropriate model for future agreements that other telecommunications providers may reach with Ameritech, nor is it likely that approval of this waiver will further the Commission's goal of introducing competitive telecommunications services to all areas of the state while maintaining universal service objectives.

The Commission further found that Ameritech has a substantial financial interest in another division of General Electric, GE Information Services. The Commission determined that, while this interest in itself may not be a sufficient basis to disapprove this waiver request, the presence of this interest is an additional indication that Ameritech has not entered into an interconnection agreement with a viable local service competitor in the manner intended by the June 6, 1996, order in this docket.

The Commission therefore denied the request of Ameritech for a waiver designating GE Capital Communications Services Corporation as an eligible carrier for purposes of the order of June 6, 1996, and directed Ameritech to implement intraLATA equal access in its local exchanges according to the previous order of July 12, 1996, in this docket.

On August 27, 1996, after the Commission's open meeting decision, Ameritech filed a request for "Commission reconsideration of its oral decision in this docket to require implementation of intraLATA presubscription as of September 1, 1996," and also asked for "a thirty day stay of that order pending [further] consideration." On August 28, 1996, the Commission sent a letter to the service list requesting comments on the Ameritech petition. Comments were received from six parties: AT&T, Ameritech, MCI, Sprint, the Commission staff, and the Wisconsin Department of Justice.

On August 29, 1996, in conjunction with its petition for reconsideration in this docket, Ameritech filed a letter with the Commission, in docket 6720-TI-122/7832-TI-101, waiving the provisions related to GECCS's agreement to purchase Ameritech intraLATA toll services and the right of first refusal regarding Ameritech's interLATA toll service. The letter requests that the Commission approve that portion of the interconnection agreements excluding the sections now waived.

Findings

The Commission found that the Ameritech filing of August 29, 1996, was not a sufficient basis upon which to reconsider the August 27 decision in this docket. While the August 29 filing purports to eliminate those sections of the interconnection agreement to which the Commission had objected, there is no evidence that the other party to the contract, GE Capital Communications Services, has agreed to this revision of the contract. There is therefore no new contract or revision to a prior contract before the Commission at this time.

Further, the Commission found that the anticompetitive aspects of the interconnection agreement that prompted the Commission's disapproval on August 27 still exist. The Commission is concerned that the tying arrangement may be in violation of state and federal anti-trust laws.

Michael Paulson
Docket 6720-TI-111
Page 3

Finally, the fact that Ameritech has unilaterally amended substantive terms of this agreement only strengthens this Commission's impression that this is not an arm's-length transaction with a competing provider of local telecommunications services in Wisconsin.

The Commission therefore determined that the terms and other circumstances of the interconnection agreement between Ameritech and GECCS were unchanged from August 27, 1996, and denied the petition for reconsideration. The Commission also denied Ameritech's request for a stay of the August 27 order in this docket.

The Commission is providing a copy of this letter order to GE Capital Communications Services and the Federal Communications Commission, Common Carrier Bureau, for their information. If you have any further questions regarding this matter, please contact Dennis Klaila at (608) 267-9780.

By the Commission.

Signed this 29th day of August 1996



Lynda L. Dorr
Secretary to the Commission

LLD:DJK:lep:h:\ss\lorder\111_829.ltr

cc: Records Management, PSCW
Service List
Laurence D. Atlas, Federal Communications Commission
Stephen L. Schilling, GE Capital Communications Services

See attached Notice of Appeal Rights.

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in s. 227.53, Stats. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in s. 227.01(3), Stats., a person aggrieved by the order has the further right to file one petition for rehearing as provided in s. 227.49, Stats. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with s. 227.48(2), Stats., and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 4/22/91

In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the Telecommunications Act of 1996.

Rebecca J. Wolfe

 ROBECCA J. WOLFE
 Notary Public, Eaton County, MI
 My Comm. Expires Feb. 14, 2000
 "(acting in Ingham County)"

U-11104 Service List

AT&T

Larry Salustro (P44174)
Cheryl Urbanski (P55005)
4660 S. Hagadorn Rd., Suite 640
East Lansing, MI 48823
(517) 332-9610
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(312) 230-8210 (Fax)

George Hogg, Jr. (P15055)
Fischer, Franklin & Ford
3505 Guardian Bldg.
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(313) 962-5210
(313) 962-4559 (Fax)

MCTA

David Marvin (P26564)
Michael Ashton (P40474)
Fraser Trebilcock Davis & Foster, PC
1000 Michigan National Tower
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(517) 485-5800

TCG

Roderick Coy (P12290)
Stewart Binke (P47149)
Clark Hill P.L.C.
200 N. Capitol Ave., Suite 600
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Douglas Trabaris
233 S. Wacker Dr., Suite 2100
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Norman Witte (P40546)
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September 26, 1996

Michigan Public Service Commission
Attn: Carol Tomak
6545 Mercantile Way
P.O. Box 30221
Lansing, MI 48909



RE: Service List for Docket U-11104

Dear Ms. Tomak:

Please be advised that the address for Todd Stein who is representing Brooks Fiber Communications in the above-referenced docket is incorrect as it appears on the Service List. The correct address is as follows:

Mr. Todd J. Stein
Brooks Fiber Communications
2855 Oak Industrial Drive, NE
Grand Rapids, MI 49506-1277

Please adjust your records accordingly to reflect this change. By copy of this letter I am notifying all parties listed on the Service List of the changes made herein.

SUBMITTED BY:

A handwritten signature in cursive script, reading "Paula K. Venema". The signature is written in dark ink and is positioned above the printed name and title.

Paula K. Venema
Administrative Assistant
Regulatory Affairs

AUTHORIZATION:

A handwritten signature in cursive script, reading "Todd J. Stein". The signature is written in dark ink and is positioned above the printed name and title.

Todd J. Stein, Esq.
Regulatory Specialist
Regulatory Affairs

144 Michigan Avenue
Room 1150
Detroit, MI 48226
Office 313-223-8033
Fax 313-496-9326

Craig A. Anderson
Counsel

Ameritech

September 30, 1996

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Re: MPSC Case No. U-11104.

Dear Ms. Wideman:

Enclosed for filing in the above-referenced case is an original and fifteen copies of the Application of Ameritech Michigan For Approval of a Statement of Generally Available Terms and Conditions and supporting Affidavits.

Very truly yours,

Craig A. Anderson

Enclosures

cc: Hon. Theodora M. Mace
All Parties of Record

CAA:jkt

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)	
to consider Ameritech Michigan's compliance)	Case No. U-11104
with the competitive checklist in Section 271)	
of the Telecommunications Act of 1996.)	
_____)	

**APPLICATION OF AMERITECH MICHIGAN
FOR APPROVAL OF A STATEMENT OF
GENERALLY AVAILABLE TERMS AND CONDITIONS**

Ameritech Michigan¹ applies to the Michigan Public Service Commission (Commission), pursuant to Section 252(f) of the Telecommunications Act of 1996, Pub. Law 104-104, 110 Stat. 56 (1996), 47 U.S.C. 151 et seq. (the federal Act), for approval of a Statement of Generally Available Terms and Conditions (the General Statement). Ameritech Michigan also relies upon the Commission's orders herein and applicable provisions of the Michigan Telecommunications Act, as amended, MCL 484.2101 et seq. (MTA). This application includes the attached General Statement and affidavits. In further support of its application, Ameritech Michigan states as follows.

I. PURPOSE AND EFFECT

Under the federal Act, incumbent local exchange carriers such as Ameritech Michigan and requesting telecommunications carriers may enter into binding interconnection and access agreements which are subject to review and approval by the state commission. Sections 252(a) through (e) of the federal Act set

¹Michigan Bell Telephone Company, a Michigan corporation, is a wholly owned subsidiary of Ameritech Corporation, which owns the former Bell operating companies in the states of Michigan, Illinois, Wisconsin, Indiana, and Ohio. Michigan Bell offers telecommunications services and operates under the names "Ameritech" and "Ameritech Michigan" (used interchangeably herein), pursuant to assumed name filings with the state of Michigan.

forth the standards for state commission involvement in the approval of negotiated agreements, as well as procedures for mediation and for arbitration if voluntary negotiation is not successful, and for the approval of arbitrated agreements.

In addition, Section 252(f) permits a Bell operating company (BOC) such as Ameritech Michigan to "file with a State commission a statement of the terms and conditions that such company generally offers within that State to comply with the requirements of section 251 and the regulations thereunder and the standards applicable under this section." Thus, the purpose of a Section 252(f) statement is to facilitate the negotiation process by describing the terms and conditions generally offered by the BOC to meet its duties as provided for in Sections 251 and 252(d) of the federal Act. Moreover, a general statement will demonstrate the BOC's compliance with the applicable provisions of Sections 251 and 252.

As a general offering, the statement does not itself constitute a binding agreement or function as the equivalent of a tariff. The submission and approval of such a statement does not relieve the BOC of its duty to negotiate the terms and conditions of an agreement under Section 251 upon the request of a telecommunications carrier.

Requesting carriers have a variety of options available to them. First, they may accept the terms offered in the statement as is by entering into a contract for the standard arrangement described in the statement. Second, they may request a carrier-specific agreement through negotiation and, if required, arbitration. Third, they may request interconnection under the terms and conditions of other agreements which have been approved by the state commission in accordance with the provisions of Section 252(i). Finally, to the extent that services subject to Section 251 obligations are also provided under tariff, they may take service pursuant to such tariffs.

General statements are designed to expedite the negotiation process by providing a baseline that has been approved by the Commission for compliance with the duties prescribed by Sections 251 and 252(d) of the federal Act. For this reason, statements are held to the same standard under the federal Act as arbitrated agreements, including those relative to pricing. Sections 252(f)(3) and (4) provide the schedule for review and continuing review of statements.

II. DESCRIPTION OF GENERAL STATEMENT

The General Statement covers all of the services and capabilities which Ameritech Michigan is required to provide to requesting carriers under Section 251 of the federal Act and is in compliance with the regulations adopted by the Federal Communications Commission (FCC) to implement the federal Act. *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, released August 8, 1996 (hereafter, the First Report and Order) and Second Report and Order and Memorandum Opinion and Order released August 8, 1996 (hereafter the Second Report and Order). The General Statement is presented in detail in the attachments. This application provides a summary overview of and guide to the General Statement.

The services and capabilities offered in the General Statement are also discussed in the attached affidavits of Gregory Dunny, William Palmer, Daniel Broadhurst, Scott Alexander, John Pautlitz, Wayne Heinmiller, Ramont Bell, and Lisa Robertson. Mr. Dunny provides an overview of the product and service offerings on interconnection, access to unbundled network elements, routing and branding of OS/DA, Ameritech Michigan's bona fide request process, interim number portability, access to rights-of-way, 9-1-1, database services, and directories. Mr. Palmer addresses how the prices in the General Statement comport with the FCC's TELRIC standards. Mr. Broadhurst discusses how joint and

common costs were attributed to individual network elements and interconnection services.² Database access, operational interfaces, and similar issues are discussed in Messrs. Alexander's and Heinmiller's statements. Mr. Pautlitz discusses operational interfaces and support systems used in conjunction with the resale of Ameritech Michigan's services. Mr. Bell's statement addresses poles, conduits, and rights-of-way. Ms. Robertson addresses number administration.

This application and the affidavits demonstrate that the General Statement complies with Sections 251 and 252(d) of the federal Act.

A. Interconnection

Ameritech Michigan provides interconnection for carriers' facilities and equipment for the transmission and routing of exchange traffic and exchange access traffic, or both, by any method to which the parties may agree, at any technically feasible point on Ameritech Michigan's network. This includes the line-side and trunk-side of the local switch, the trunk interconnection points for tandem switches, central office cross-connect points, out-of-band signaling transfer points necessary to exchange traffic and access to call-related databases, and points of access to unbundled network elements. (See generally 47 CFR §51.305)

As specified in the General Statement and as set forth in 47 CFR §51.305(a)(3), the quality of the interconnection that Ameritech Michigan provides to carriers is equal to that which Ameritech Michigan provides to itself or to any other affiliated or unaffiliated entity.

²Non-public versions of the Palmer and Broadhurst affidavits, along with cost study support, have been filed separately with the Commission under confidential cover pursuant to Section 210 of the MTA.

B. Transmission And Routing

Ameritech Michigan's General Statement prescribes parameters for trunk groups to be established for the transmission and routing of local and intraLATA toll traffic, exchange access traffic and 800/888 traffic, and information service traffic between the company's network and those of requesting carriers.

C. Reciprocal Compensation

Ameritech Michigan offers reciprocal compensation arrangements that will permit both the company and the requesting carrier to reasonably recover the additional costs associated with terminating each other's traffic.

D. Network Elements

Ameritech Michigan provides, as standard offerings, unbundled access to seven types of network elements. Those elements are:

- the local loop
- the Network Interface Device (NID)
- switching capacity – local switching and tandem switching
- interoffice transmission facilities – dedicated and shared transport
- signaling networks and call-related databases, including service management systems (SMS)
- operational support systems functions
- operator services and directory assistance

Under the General Statement, carriers are entitled to request the foregoing elements at the same quality Ameritech Michigan provides such elements to itself and affiliated and unaffiliated carriers. In addition, the General Statement establishes a Bona Fide Request (BFR) Process under which carriers may request:

(1) the foregoing network elements at a higher or lower standard of quality than Ameritech Michigan provides such elements to itself; (2) may request further or different unbundling; and (3) combinations of network elements and facilities.

The FCC's rules and First Report and Order identify the seven types of network elements offered by Ameritech Michigan as the core elements that an incumbent local exchange company must provide, upon request, to all requesting carriers. (47 C.F.R. §51.319) The access to unbundled elements offered by Ameritech Michigan is nondiscriminatory, as required by the Act (*Id.*, §51.311; 51.313) and imposes no limitations, restrictions, or requirements on requests for or the use of such elements that would impair the ability of a carrier to offer a telecommunications service in the manner intended by the carrier. (*Id.*, § 51.309(a)) Finally, Ameritech Michigan offers network element combinations in the manner prescribed by the FCC. The following summarizes each type of network element offered in the General Statement:

1. Local Loops. The General Statement offers a wide variety of local loop types from its central office to the customer's premises, unbundled from local switching, transport, or other services. (See generally 47 CFR §51.319(a)) Unbundled loops will be pre-ordered, ordered, provisioned, maintained, and billed through standard facilities, interfaces, specifications, procedures, and practices. Ameritech Michigan will evaluate requests for further unbundling via the BFR process.

2. NID. The General Statement provides access to an unbundled NID. Consistent with the FCC's rules, Ameritech Michigan's General Statement permits requesting carriers to connect their loops, via their own NIDs, to Ameritech Michigan's NIDs and the customer's inside wire. (47 C.F.R. §51.319(b)(2); First Report and Order, Paragraphs 392-394)

3. Local And Tandem Switching. The General Statement offers unbundled access to all local switching capacity unbundled from transport, local loop transmission, and other services. (See generally 47 CFR §51.319(c)) The requesting carrier obtains all switching features in a single element on a per-line basis. This element includes basic switching functions (e.g., connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks) and other switch capabilities (e.g., signaling, access to 911, operator services, directory assistance services, and all vertical features that the switch is capable of providing and that is available to the port type involved). Ameritech Michigan also provides customized or special routing of directory assistance and operator services traffic to different trunks to permit branding with the name of the requesting carrier or use of the operator services or directory assistance provider of the carrier's choice.

Ameritech Michigan also offers tandem switching unbundled from transport, local loop transmission, and other services. Tandem switching creates temporary transmission paths between trunks interconnected at the tandem switch for the purpose of routing calls. The tandem switching port provides to the requesting carrier all available basic tandem switching functions and capabilities that are centralized in the tandem switch. Routing, screening, and blocking are provided where technically feasible and under the guidelines of standard switching translations and screening in use in that switch.

4. Interoffice Transport. The General Statement provides two types of unbundled interoffice transmission: (1) unbundled, dedicated, interoffice transport and entrance facilities, both of which are available for the exclusive use of a telecommunications carrier; and (2) shared interoffice transmission facilities for the shared use by more than one telecommunications carrier. (See generally 47 CFR §51.319(d)) Unbundled local transport is available where facilities exist between all points specified in the FCC's rules and may be requested for other technically

feasible points under the BFR process. These interoffice facilities may be used to connect to Ameritech Michigan's switch or to the competitors' collocated equipment.

5. Signaling Networks. Ameritech Michigan is offering unbundled access to its signaling links and Signal Transfer Points (STPs). Under the General Statement, carriers may obtain unbundled access for their own switching facilities to Ameritech Michigan's signaling network through its STPs in the same manner that Ameritech Michigan's switches gain such access. (See 47 CFR §51.319(e)(1)(ii)) Ameritech Michigan is also offering carriers unbundled access to its call-related databases, including the Toll Free Calling database, the Line Information Database (LIDB), and the long term local number portability database (when that database is deployed). (See generally 47 CFR §51.319(e)(2)) Carriers may obtain this access by physically connecting their own switches through an Ameritech Michigan STP to the Ameritech Michigan unbundled database. Ameritech Michigan will also offer unbundled, nondiscriminatory access to Ameritech Michigan's AIN Service Management System (SMS) and AIN Service Creation Environment (SCE).

6. Operator Systems And Directory Assistance. The General Statement provides operator systems and directory assistance to resellers and requesting carriers on a bundled basis and as a network element. The General Statement includes manual call assistance, automated call assistance, line information database (LIDB) validation, home NPA directory assistance, customer name and address service, and information call completion.

In instances where the carrier purchases Ameritech Michigan's retail telecommunications services for resale or its unbundled local switching, the General Statement provides the reseller or carrier with both rebranding and selective routing options for operator, directory assistance, and call completion services, using line class codes or other technical solutions, as long as compliance with the carrier's requests is technically feasible. Consistent with the FCC's discussion of

the issue (First Report and Order, Paragraph 971), the General Statement provides that the carrier would pay Ameritech Michigan's costs, as determined pursuant to Section 252(d)(1) of the Act, of providing the requested branding or selective routing functions, to the extent that compliance with those requests is technically feasible and can be accomplished in a nondiscriminatory manner.

Ameritech Michigan also offers unbundled access to its operator services or directory assistance, or to related facilities or databases for use by the requesting carrier to provide those services to its own customers. Such unbundled operator services or directory assistance is offered with optional rebranding.

7. Operational Support Systems. The General Statement provides nondiscriminatory access to a range of unbundled operational support systems (OSS) functions. Ameritech Michigan will provide carriers with the same types of access for transferring and receiving of the data that it provides to its own customer contact personnel.

The General Statement describes how carriers may pre-order, order, and provision network elements through transfer of information via electronic interfaces. The General Statement also describes the electronic interfaces for transferring and receiving information in connection with maintenance and repair. Ameritech Michigan will provide usage data to facilitate customer billing (including acknowledgments and status reports) and to exchange information to process claims and adjustments. Carriers will receive the same services as Ameritech Michigan provides to itself and its customers, including the "real time" exchange of information through electronic gateway systems Ameritech Michigan employs in performing the above functions.

E. Resale Of Telecommunications Services

The General Statement provides for resale to telecommunications carriers at wholesale rates all of its telecommunications services which are provided at retail to customers who are not telecommunications carriers.

In addition, the General Statement makes "lifeline" programs -- i.e., state or federally mandated programs designed to promote universal service by providing qualified low income residential end users with certain credits toward line connection fees (and, in some cases, toward monthly usage charges) -- available for resale.

With respect to "sunsetted" and "grandfathered" services, the General Statement provides that in accordance with the FCC's regulations, those services are available for resale by carriers to end user customers receiving those services at the time they select another carrier as their service provider until the services are no longer offered. (See 47 C.F.R. §51.615; First Report and Order, Paragraph 968)

With respect to promotional offerings, the General Statement reflects the requirement of the FCC's First Report and Order that short term promotions of 90 days or less need not be made available for resale. However, the FCC's First Report and Order leaves additional issues relating to such restrictions on resale to the states. (Paragraph 952) Section 357 of the MTA provides that promotional and discounted offerings are not required to be made available for resale. Therefore, Ameritech Michigan requests that the Commission, in its order approving the General Statement, recognize that promotions and discounts need not be made available for resale in Michigan, as mandated by the MTA and consistent with the Act and the First Report and Order, and authorize Ameritech Michigan to amend its General Statement accordingly.

The General Statement further provides that carriers will receive notice of any new Ameritech Michigan retail telecommunications services via tariff filings and as provided in an Operations Plan developed by the parties. These new and revised retail telecommunications services also would be available for resale by carriers on a wholesale basis.

F. Notice Of Changes

The General Statement provides that Ameritech Michigan will provide requesting carriers with advance notice of network changes that will materially affect the interoperability of their networks or of a change in the information necessary for the transmission and routing of services using Ameritech Michigan's facilities or network in accordance with the regulations of the FCC. (See also 47 CFR §51.325, et seq.)

G. Collocation

Ameritech Michigan's General Statement provides for physical collocation in its central offices and on other company property where access is required in which requesting carriers will be able to place their equipment used for interconnection or access to unbundled elements, including transmission equipment, such as optical terminating equipment and multiplexers and equipment for the termination of basic transmission facilities as provided in 47 C.F.R. §51.323(b)(2), except where physical collocation is not practical for technical reasons or because of space limitations.

Where technically feasible, Ameritech Michigan will provide for virtual collocation of such equipment designated by requesting carriers. For either collocation option, requesting carriers may connect collocated equipment to

transmission facilities provided by the requesting carrier itself, a third party, or Ameritech Michigan.

Further, the General Statement provides that carriers with proper collocation arrangements may cross-connect their collocated equipment.

H. Number Portability

Ameritech Michigan's General Statement provides interim number portability in compliance with the federal Act and the FCC's order on number portability. (FCC Docket No. 95-116, issued July 2, 1996) Specifically, Ameritech Michigan is offering Remote Call Forwarding (RCF) and Direct Inward Dialing (DID). These are the two methods that the FCC and this Commission have identified as appropriate, currently available number portability options. (C.C. Docket No. 95-116, July 2, 1996, at Paragraphs 19, 103, 110)

I. Dialing Parity

The General Statement offers competing providers all services and information as are necessary to allow the requesting carrier to implement local dialing parity. As recognized by the FCC in its Second Report and Order (Paragraph 71), local dialing parity is achieved through the implementation of the interconnection, number portability, and nondiscriminatory access to telephone number requirements of Section 251 of the federal Act.

IntraLATA toll dialing parity is addressed in Mr. Dunny's affidavit.

J. Directory Listings

Customers of other carriers will be provided with listings in white pages directories published for Ameritech Michigan. These listings will be provided

free of charge. All white pages listings will have the same appearance and presentation, and requesting carriers' customer listings will be interfiled with Ameritech Michigan's. Listings other than the primary listing for that customer or listings in directories that would not normally include that subscriber will be made available at reasonable charges.

K. Poles, Conduits, And Rights-Of-Way

The General Statement provides a comprehensive program for processing requests for access to structures that satisfies all of the requirements of the federal Act and the FCC's regulations and order. Access to structures will be effected through Ameritech Michigan's Structure Leasing Coordinator, who will serve as the single point of contact for access to Ameritech Michigan's structures.

Ameritech Michigan's General Statement also addresses, among other things, conditions under which structures will be made available, the procedure, prerequisites, and charges associated with modifying structures, and installation and maintenance responsibilities and standards.

The General Statement describes how Ameritech Michigan provides access to the maps, records, and other information regarding its structures. This will permit requesting carriers to incorporate Ameritech Michigan's structures into their network planning and engineering in the same fashion as Ameritech Michigan.

In addition, as previously indicated, Ameritech Michigan is creating a separate unit to administer its poles, ducts, conduits, and rights-of-way. No party, including Ameritech Michigan itself, will be allowed access to Ameritech Michigan's structures except through requests made to the Structure Leasing Coordinator. Access to available capacity will be allowed on a "first in time, first in right" priority

queue basis. The Structure Leasing Coordinator will ensure that requests are administered without discrimination.

Finally, Ameritech Michigan will provide requesting parties with the field surveys and construction work necessary to make its structures ready for attachments as it does for itself.

L. Number Administration

The General Statement provides nondiscriminatory access to telephone numbers for other carriers. Until new number administration guidelines, plans, or rules are established, Ameritech Michigan will continue to assign central office codes under existing industry guidelines (i.e., the Central Office Code Assignment Guidelines and the NPA Code Relief Planning Guidelines). All NXX number assignments will continue to be performed by Ameritech Michigan, subject to the oversight and complaint jurisdiction of this Commission and the FCC.

M. 9-1-1 Service

Ameritech Michigan provides requesting carriers with nondiscriminatory access to 911 and E911 services that will be identical to the 911 service provided by Ameritech Michigan to its local exchange customers residing in the same municipalities.

III. PRICING

A. Interconnection, Network Elements, And Collocation

In accordance with the FCC order, Ameritech Michigan offers interconnection, network elements, and collocation pursuant to the pricing standards set forth in Sections 251(c)(2), (3) and 252(d)(1). Ameritech Michigan's

prices for these network elements and services are set forth in the Pricing Schedule attached to the General Statement. These prices are based on Ameritech Michigan's forward-looking economic costs, as determined in recent and comprehensive Total Element Long Run Incremental Cost (TELRIC) studies. The methodology utilized in Ameritech Michigan's TELRIC studies is completely consistent with both the FCC's requirements and the requirements of this Commission.

Ameritech Michigan calculated TELRIC so as to fully capture prospective costs, carefully identifying the facilities and functions, including operating and capital expenses, directly attributable or incremental to each unbundled element and to interconnection or collocation services. Ameritech Michigan properly measured these costs based on the most efficient available technology and the lowest cost network configuration, given the location of its existing wire centers. In doing so, Ameritech Michigan applied assumptions with regard to depreciation lives, cost of capital, and network utilization that comply with the FCC's requirements. (See 47 C.F.R. §51.505(b); First Report and Order, Paragraphs 682, 686-687; 702-703)

After calculating TELRIC, Ameritech Michigan added a reasonable allocation of forward-looking joint and common costs – efficiently incurred costs not directly attributable to individual elements or collocation services – based on current studies. These include costs shared by groups of elements and costs incurred by Ameritech Michigan's operations as a whole, such as the costs of corporate human resources services. (See 47 C.F.R. §51.505(c); First Report and Order, Paragraphs 695; 698)